

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

- against -

GLOBAL INVESTMENT STRATEGY UK LTD.,

and

JOHN WILLIAM GUNN

Defendants.

Case No. 20-cv-10838 (AKH)

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss, and Declaration of John William Gunn, dated April 1, 2021, Defendants Global Investment Strategy UK Ltd. ("GIS") and John William Gunn ("Mr. Gunn"), by and through their attorneys, will move before the Honorable Alvin K. Hellerstein, United States District Judge of the United States District Court, Southern District of New York, at 500 Pearl Street, New York, New York 10007, on a date and time designated by the Court, for an Order dismissing the Complaint (Dkt. No. 1) with prejudice as against both Defendants pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure and as against Mr. Gunn pursuant to Rules 12(b)(2) and 12(b)(5) of the Federal Rules of Civil Procedure, and for such other and further relief as the Court deems necessary and proper. The grounds upon which GIS and Mr. Gunn seek relief are set forth in detail in the accompanying Memorandum.

Dated: April 2, 2021
New York, New York

Respectfully submitted,

DLA PIPER LLP (US)

s/ Caryn Schechtman

Caryn Schechtman
Thomas Alford
Joshua Kane
1251 Avenue of the Americas
New York, New York 10020
Tel: (212) 335-4500
caryn.schechtman@us.dlapiper.com
thomas.alford@us.dlapiper.com
joshua.kane@us.dlapiper.com

*Counsel for Defendants
Global Investment Strategy UK Ltd. and
John William Gunn*